

EXHIBIT F

From: [SocialMediaPI](#) on behalf of [Hampton, James R. \(SHB\)](#)
To: SOCIALMEDIAPI@SKADDENLISTS.COM
Subject: MDL - Guzman Production Deficiencies
Date: Thursday, March 27, 2025 10:04:36 AM

This Message originated outside your organization.

Counsel,

Defendants have identified a number of production-related deficiencies (described below) that require your immediate attention. The list of deficiencies below is not exhaustive, and Defendants reserve the right to raise additional production deficiencies to the extent we become aware of them.

During Plaintiff (Maria Elena Rodriguez) and her daughter's () depositions, there was inconsistent testimony regarding who was involved in procuring 's letter in which states that . Any communication between Plaintiff, , and that was made in connection with the letter or otherwise concerning this lawsuit should have been produced in response to written discovery that we served on Plaintiff and . See Defendants' First Request for Production to Plaintiff Maria Elena Rodriguez, RFP Nos. 35, 36, and 44; Fed. R. Civ. P. 45 Subpoena to to Produce Documents, Request Nos. 2, 38. Defendants (again) request collection and production of these communications.

Based on testimony during recent depositions, we believe that M.G. .
 See Plaintiff Maria Elena Rodriguez's Responses and Objections to Defendants' Interrogatories, Set One, Response to Interrogatory No. 6 .
). Only one iPad was identified on Plaintiff's ESI Disclosures. Defendants request that this additional iPad be imaged for review and production.

Testimony during recent depositions indicates that M.G. .
 The was also not included in Plaintiff's ESI Disclosures. Defendants request that Plaintiff produce relevant information from this .

We do not believe Plaintiff produced data from M.G.'s Outlook Email or iCloud Accounts. Please confirm that you have taken reasonable steps to locate passwords for those sources, and to collect documents from the same.

In addition, forensic collections from M.G.'s devices reflect the use of a number of applications/accounts that likely contain information responsive to Defendants' document requests, but that do not appear to be included in existing productions. Those applications/accounts are listed below. As you may be aware, Judge Kuhl ordered production from additional applications/accounts at the March 19, 2025 Case Management Conference, and we believe productions from the

applications/accounts identified below are appropriate and consistent with Plaintiff's discovery obligations in this case.

Please let us know as soon as possible if you are willing to resolve these deficiencies, or provide your availability for a meet and confer.

Thank you.

M.G.'s Applications/Accounts

Quora

Roblox

Minecraft

Pinterest

Xbox Live

[REDACTED]

[REDACTED]

VSCO

Intermittent Fasting Tracker

Nike Run Club – Running Coach

Pedometer++

Chef Umami

Water Sort Puzzle

X2 Blocks – 2048 Number Game

LifeOmic

Apollo for Reddit

Skype

Be a Bartender!

James R. Hampton

Associate

Shook, Hardy & Bacon L.L.P.

| jhampton@shb.com



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